

DAVID L. ANDERSON, CSBN 149604  
United States Attorney  
DEBORAH LEE STACHEL  
Regional Chief Counsel, Region IX  
Social Security Administration  
TINA L. NAICKER, CSBN 252766  
Special Assistant United States Attorney  
160 Spear Street, Suite 800  
San Francisco, California 94105  
Telephone: (415) 268-5611  
Facsimile: (415) 744-0134  
E-Mail: Tina.Naicker@SSA.gov

Attorneys for Defendant

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

PATRICIA MCTERNAN,

Plaintiff,

VS.

NANCY A. BERRYHILL,  
Acting Commissioner of Social Security

Defendant.

Case No.: 3:18-cv-07036-WHO

**JOINT STIPULATION AND  
[PROPOSED] ORDER FOR EXTENSION  
OF TIME FOR DEFENDANT TO  
RESPOND TO PLAINTIFF'S MOTION  
FOR SUMMARY JUDGMENT**

IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record that the time for responding to Plaintiff's Motion Summary Judgment be extended from May 27, 2019 to **July 9, 2019**. This is Defendant's first request for extension. Good cause exists to grant Defendant's request for extension. Counsel for Defendant (Counsel) had multiple family tragedies last month, including the death of her two cousins, and uncle and was out of the office attending prayer and funeral services. Counsel also has been out of the office taking care of her elderly mother, who is schedule for two surgeries this month, and also out due to her ongoing health issues. In addition, Counsel also has over 100+ active social security matters, which require two or more dispositive motions per week until the mid-July. Due to heavy caseload and unexpected leave, Counsel fell behind on her work and needs additional time to adequately

JS for Extension of Time and PO:

Case No. 3:18-cv-07036-WHO

1 review the transcript and properly respond to Plaintiff's Motion for Summary Judgment. The  
2 parties further stipulate that the Court's Scheduling Order shall be modified accordingly.  
3 Defendant makes this request in good faith with no intention to unduly delay the proceedings.  
4 Counsel apologizes for the belated request, but made her request as soon as reasonably  
5 practicable, as she also has been out of the office.

6 Respectfully submitted,

8 Respectfully submitted,

10 Dated: May 16, 2019

/s/ Terry LaPorte  
(\*as authorized by email on May 16, 2019)  
TERRY LaPORTE  
Attorney for Plaintiff

14 Dated: May 16, 2019

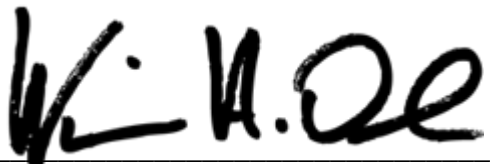
DAVID L. ANDERSON  
United States Attorney  
DEBORAH LEE STACHEL  
Regional Chief Counsel, Region IX  
Social Security Administration

18 By /s/ Tina L. Naicker  
TINA L. NAICKER  
Special Assistant U.S. Attorney  
Attorneys for Defendant

21 **ORDER**

23 APPROVED AND SO ORDERED:

26 DATED: May 20, 2019

24   
THE HONORABLE WILLIAM H. ORRICK  
UNITED STATES DISTRICT COURT JUDGE